

**Ex. A**



**Service of Process  
Transmittal**

07/02/2019

CT Log Number 535794970

**TO:** Tessa Cierny  
Mercedes-Benz USA, LLC  
ONE MERCEDES-BENZ DRIVE  
SANDY SPRINGS, GA 30328-4312

**RE:** **Process Served in New Jersey**

**FOR:** Mercedes-Benz USA, LLC (Domestic State: DE)

Email Notification, Madison Coker mcoker@wwhgd.com

Email Notification, Jonathan Friedman mbwarranty@wwhgd.com

Email Notification, AUDRA DIAL audra.dial@mbusa.com

Email Notification, SHERRY ROSEN sherry.rosen@mbusa.com

Email Notification, Lance Arnott SOPVerification@wolterskluwer.com

**SIGNED:**  
**ADDRESS:**

The Corporation Trust Company  
820 Bear Tavern Road  
3rd Floor  
West Trenton, NJ 08628  
609-538-1818

**TELEPHONE:**

**SUMMONS**Attorney(s) ROBERT G. RICCOOffice Address 811 Westwood AvenueTown, State, Zip Code River Vale, NJ 07675Telephone Number 201 961-2142Attorney(s) for Plaintiff ALEXANDRU POPAALEXANDRU POPA

Plaintiff(s)

vs.

VANESSA PEREZMERCEDES-BENZ USA LLC

Defendant(s)

**Superior Court of  
New Jersey**Hudson ☒ County

LAW Division

Docket No: HUD-L-2467-19**CIVIL ACTION  
SUMMONS**

From The State of New Jersey To The Defendant(s) Named Above:

The plaintiff, named above, has filed a lawsuit against you in the Superior Court of New Jersey. The complaint attached to this summons states the basis for this lawsuit. If you dispute this complaint, you or your attorney must file a written answer or motion and proof of service with the deputy clerk of the Superior Court in the county listed above within 35 days from the date you received this summons, not counting the date you received it. (A directory of the addresses of each deputy clerk of the Superior Court is available in the Civil Division Management Office in the county listed above and online at [http://www.njcourts.gov/forms/10153\\_deptyclerklawref.pdf](http://www.njcourts.gov/forms/10153_deptyclerklawref.pdf).) If the complaint is one in foreclosure, then you must file your written answer or motion and proof of service with the Clerk of the Superior Court, Hughes Justice Complex, P.O. Box 971, Trenton, NJ 08625-0971. A filing fee payable to the Treasurer, State of New Jersey and a completed Case Information Statement (available from the deputy clerk of the Superior Court) must accompany your answer or motion when it is filed. You must also send a copy of your answer or motion to plaintiff's attorney whose name and address appear above, or to plaintiff, if no attorney is named above. A telephone call will not protect your rights; you must file and serve a written answer or motion (with fee of \$175.00 and completed Case Information Statement) if you want the court to hear your defense.

If you do not file and serve a written answer or motion within 35 days, the court may enter a judgment against you for the relief plaintiff demands, plus interest and costs of suit. If judgment is entered against you, the Sheriff may seize your money, wages or property to pay all or part of the judgment.

If you cannot afford an attorney, you may call the Legal Services office in the county where you live or the Legal Services of New Jersey Statewide Hotline at 1-888-LSNJ-LAW (1-888-576-5529). If you do not have an attorney and are not eligible for free legal assistance, you may obtain a referral to an attorney by calling one of the Lawyer Referral Services. A directory with contact information for local Legal Services Offices and Lawyer Referral Services is available in the Civil Division Management Office in the county listed above and online at [http://www.njcourts.gov/forms/10153\\_deptyclerklawref.pdf](http://www.njcourts.gov/forms/10153_deptyclerklawref.pdf).

MICHELLE M. SMITH, Clerk /s/  
Clerk of the Superior Court

DATED: 06/30/2019Name of Defendant to Be Served: MERCEDES BENZ USA LLC via registered agentAddress of Defendant to Be Served: C/O Corporation Trust Company 820 Bear Tavern Rd. #305 Trenton, NJ 08628

Law Office of Robert G. Ricco, Esq.  
811 Westwood Avenue  
River Vale, New Jersey 07675  
Telephone: (201) 497-6524  
Attorneys for Plaintiff  
Attorney Bar No. **Bar No.: 051051995**

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SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION: HUDSON COUNTY

ALEXANDRU POPA,

Plaintiff(s),

Docket No. \_\_\_\_\_

vs.

CIVIL ACTION

MOTOR VEHICLE ACCIDENT  
COMPLAINT AND DEMAND

VANESSA PEREZ,  
MERCEDES-BENZ CORPORATION  
Otherwise known as  
MERCEDES-BENZ USA, LLC  
JOHN and JANE DOES  
(I-100) and XYZ COMPANIES  
(I-100),

FOR TRIAL BY JURY

Defendant(s).

DESIGNATION OF TRIAL ATTORNEY  
DEMAND FOR ANSWERS TO  
INTERROGATORIES

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PETITIONER, ALEXANDRU POPA, (herein after referred to as "Plaintiff") residing at 64 South Main Street, Apt. 1F, Spring Valley, NY 10977 in the County of Bergen and State of New Jersey, complaining of the Defendant, deposes and says:

**FIRST COUNT**

**NEGLIGENCE AS TO VANESSA PEREZ**

1. On or about July 2, 2017, Plaintiffs, ALEXANDRU POPA as driver, were the operator of a certain motor vehicle, being a 2016 black Mercedes Benz, with NY plate number HAH4665, and VIN number

55SWF4KBOGU114654, while travelling in West New York, Southbound on Port Imperial Road towards New York, at or about 4:23 AM, observed Defendant heading Northbound on Port Imperial Road, heading towards Hillside Road, making a turn crossing into his oncoming lane, disregarding the traffic and against the traffic light, when he was struck in the front and or side of his car, by the car driven by the defendant.

2. On or about July 2, 2017, defendant VANESSA PEREZ, (hereinafter referred to as "Defendant"), residing at 1223 81<sup>st</sup> Street, Apt. 1, in North Bergen, NJ 07047-4153, was the owner and operator of a certain motor vehicle, being a 2000 White Jeep Cherokee, said motor vehicle bearing NJ license plate No. B96HXX and upon information and belief bearing VIN number 1J4FT48S7XL123877, which was traveling northbound on said Port Imperial Road, heading towards Hillside Road, in West New York, in the County of Hudson and State of New Jersey, when an accident took place at that location when Defendant, improperly crossed into the oncoming lane of the Plaintiff at or about the time as reported on the police report, being the morning of July 2, 2017.

3. Defendant did so negligently and carelessly own, operate and/or maintain the aforesaid motor vehicle so as to cause same to collide with the Plaintiff. The defendant was charged with careless driving and driving under the influence as reported on the police report.

4. As a direct and proximate result of the negligence of the Defendant, as aforesaid, Plaintiff was caused to sustain and did sustain serious and permanent personal injuries requiring the care and treatment of physicians, hospitalization and medication and has been and will in the future continue to be hampered in his daily routine.

WHEREFORE, Plaintiffs demands judgment against the Defendant, in the amount of his damages together with interest and costs of suit, for:

- (a) Actual Damages;
- (b) Consequential Damages;
- (c) Pain and suffering;
- (d) Out of Pocket expenses;
- (e) Medical treatment and future medical treatment;
- (f) Emotional distress and Psychiatric care;
- (g) Punitive Damages; Pre and Post Judgment interest, Costs of Suit;
- (h) Attorney Fees; and
- (i) Such other relief as the Court may deem equitable and just.

## SECOND COUNT

### PRODUCTS LIABILITY in the form of NEGLIGENCE and/or IN STRICT LIABILITY AS TO MERCEDES- BENZ CORPORATION REGARDING THE FAILURE OF THE SEATBELT AND OR FAILURE OF THE AIRBAG TO DEPLOY TO PROTECT THE PLAINTIFF

5. Plaintiff repeats and re-alleges each and every one of the aforementioned allegations as if set forth herein at length.

6. On or about July 2, 2017, Plaintiffs, ALEXANDRU POPA as driver, were the operator of a certain motor vehicle, being a 2016 black Mercedes Benz, with plate number HAH4665, and VIN number 55 swf4kbogu114654, while travelling in West New York, Southbound on Port Imperial Road towards New York, at or about 4:23 AM, observed Defendant heading Northbound on Port Imperial Road, heading towards Hillside Road, making a turn crossing into his oncoming lane, disregarding the traffic and against the traffic light, when he was

struck in the front and or side of his car, by the car driven by the defendant.

7. At the time of the occurrence, his airbag and or seatbelt failed, to deploy and or restrain him, within his Mercedes Benz automobile. We believe that this was due either to a manufacturing defect, or a design defect, via negligence or strict liability, and or some other form of negligence on the part of the manufacturer, as the car was a 2016 model and rather new. We believe that Mercedes-Benz Corporation also goes by the name Mercedes-Benz USA, LLC, located at 1 Mercedes-Benz Drive, Sandy Springs, GA 30328.

8. As a direct and proximate result of the negligence, or design defect, or manufacturing defect of the Defendant MERCEDES BENZ CORPORATION, as aforesaid, Plaintiff was caused to sustain and did sustain serious and permanent personal injuries requiring the care and treatment of physicians, hospitalization and medication and has been and will in the future continue to be hampered in his daily routine.

WHEREFORE, Plaintiffs demands judgment against the Defendant MERCEDES BENZ CORPORATION, in the amount of his damages together with interest and costs of suit, for:

- (a) Actual Damages;
- (b) Consequential Damages;
- (c) Pain and suffering;
- (d) Out of Pocket expenses;
- (e) Medical treatment and future medical treatment;
- (f) Emotional distress and Psychiatric care;
- (g) Punitive Damages; Pre and Post Judgment interest, Costs of Suit;
- (h) Attorney Fees; and
- (i) Such other relief as the Court may deem equitable and just.

THIRD COUNT

RES IPSA LOQUITUR AS TO MERCEDES BENZ CORPORATION REGARDING THE  
FAILURE OF THE SEATBELT AND OR FAILURE OF THE AIRBAG TO DEPLOY TO PROTECT THE  
PLAINTIFF

9. Plaintiff repeats and re-alleges each and every one of the aforementioned allegations as if set forth herein at length.

10. On or about July 2, 2017, Plaintiffs, ALEXANDRU POPA as driver, were the operator of a certain motor vehicle, being a 2016 black Mercedes Benz, with plate number HAH4665, and VIN number 55 swf4kbogul14654, while travelling in West New York, Southbound on Port Imperial Road towards New York, at or about 4:23 AM, observed Defendant heading Northbound on Port Imperial Road, heading towards Hillside Road, making a turn crossing into his oncoming lane, disregarding the traffic and against the traffic light, when he was struck in the front and or side of his car, by the car driven by the defendant.

11. At the time of the occurrence, his airbag and or seatbelt failed, to deploy and or restrain him, within his Mercedes Benz automobile. We believe that this was due either to a manufacturing defect, or a design defect, via negligence or strict liability, and or other negligence on the part of the manufacturer, as the car was a 2016 model and rather new. If no exact cause is found for the failure of these parts, being seatbelt and airbag and related aspects, or otherwise cannot be determined, then we allege that the failure “speaks for itself” as proof of negligence, under *Res Ipsa Loquitur* theory.

12. As a direct and proximate result of the negligence via *Res Ipsa Loquitur*, the Defendant MERCEDES BENZ CORPORATION, as aforesaid, harmed Plaintiff who was caused to sustain, and did sustain, serious and



permanent personal injuries requiring the care and treatment of physicians, hospitalization and medication and has been and will in the future continue to be hampered in his daily routine.

WHEREFORE, Plaintiffs demands judgment against the Defendant MERCEDES BENZ CORPORATION, in the amount of his damages together with interest and costs of suit, for:

- (a) Actual Damages;
- (b) Consequential Damages;
- (c) Pain and suffering;
- (d) Out of Pocket expenses;
- (e) Medical treatment and future medical treatment;
- (f) Emotional distress and Psychiatric care;
- (g) Punitive Damages; Pre and Post Judgment interest, Costs of Suit;
- (h) Attorney Fees; and
- (i) Such other relief as the Court may deem equitable and just.

#### **FOURTH COUNT**

##### **BREACH OF WARRANTY OF FITNESS AS TO MERCEDES BENZ CORPORATION REGARDING THE FAILURE OF THE SEATBELT AND OR FAILURE OF THE AIRBAG TO DEPLOY TO PROTECT THE PLAINTIFF**

13) Plaintiff repeats and re-alleges each and every one of the aforementioned allegations as if set forth herein at length.

14) On or about July 2, 2017, Plaintiffs, ALEXANDRU POPA as driver, were the operator of a certain motor vehicle, being a 2016 black Mercedes Benz, with plate number HAH4665, and VIN number 55 swf4kbogu114654, while travelling in West New York, Southbound on Port Imperial Road towards New York, at or about 4:23 AM, observed Defendant heading Northbound on Port Imperial Road, heading towards Hillside Road, making a turn

crossing into his oncoming lane, disregarding the traffic and against the traffic light, when he was struck in the front and or side of his car, by the car driven by the defendant.

15) At the time of the occurrence, his airbag and or seatbelt failed, to deploy and or restrain him, within his Mercedes Benz automobile. We believe that this was due either to a manufacturing defect, or a design defect, via negligence or strict liability, and or other negligence on the part of the manufacturer, as the car was a 2016 model and rather new. We also allege that the failure of these parts, being seatbelt and airbag and related aspects, bespeaks of a failure of these parts as a breach of the implied warranty of fitness by MERCEDES-BENZ.

16) As a direct and proximate result of the breach of the implied warranty of fitness, the Defendant MERCEDES BENZ CORPORATION, as aforesaid, harmed Plaintiff who was caused to sustain, and did sustain, serious and permanent personal injuries requiring the care and treatment of physicians, hospitalization and medication and has been and will in the future continue to be hampered in his daily routine.

WHEREFORE, Plaintiffs demands judgment against the Defendant MERCEDES BENZ CORPORATION, in the amount of his damages together with interest and costs of suit, for:

- (a) Actual Damages;
- (b) Consequential Damages;
- (c) Pain and suffering;
- (d) Out of Pocket expenses;
- (e) Medical treatment and future medical treatment;
- (f) Emotional distress and Psychiatric care;
- (g) Punitive Damages; Pre and Post Judgment interest, Costs of Suit;
- (h) Attorney Fees; and
- (i) Such other relief as the Court may deem equitable and just.

Dated: June 20, 2019

Robert G. Ricco  
811 Westwood Avenue  
River Vale, NJ 07675  
Telephone: (201) 961-2142  
Attorneys for Plaintiffs

*Robert G. Ricco*

By: \_\_\_\_\_

Robert G. Ricco, Esq.

JURY DEMAND

Plaintiff demands trial by jury as to all issues triable as of right by jury.

Dated: June 20, 2019

Robert G. Ricco  
811 Westwood Avenue  
River Vale, NJ 07675  
Telephone: (201) 961-2142  
Attorneys for Plaintiffs

*Robert G. Ricco*

By: \_\_\_\_\_

Robert G. Ricco, Esq. *Of Counsel*

NOTICE OF OTHER ACTIONS PURSUANT TO RULE 4:5-1

I certify that the matter in controversy is not the subject of any other action pending in any Court or of a pending arbitration proceeding and that no other action or arbitration proceeding is contemplated. I know of no other parties who should be joined in the action.

Dated: June 20, 2019

Robert G. Ricco  
811 Westwood Avenue  
River Vale, NJ 07675  
Telephone: (201) 961-2142  
Attorneys for Plaintiffs

*Robert G. Ricco*

By: \_\_\_\_\_

Robert G. Ricco, Esq. *Of Counsel*

DESIGNATION OF TRIAL COUNSEL

Please take notice that Robert G. Ricco, Esq., is hereby designated as Trial Counsel in the above-captioned matter, pursuant to R.4:25 et. seq.

Dated: June 20, 2019

Robert G. Ricco  
811 Westwood Avenue  
River Vale, NJ 07675  
Telephone: (201) 961-2142  
Attorneys for Plaintiffs

*Robert G. Ricco*

By: \_\_\_\_\_  
Robert G. Ricco, Esq. *Of Counsel*

Certification of Compliance with Rule 1:38-7(c)

Pursuant to Rule 1:38- (c) I hereby certify that this, the first filed pleading of any party in an action in the Chancery Division, General Equity or in the Law Division, Special Civil Part is redacted as to personal identifiers, and further certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with Rule 1:38-7(b).

Dated: June 20, 2019

Robert G. Ricco  
811 Westwood Avenue  
River Vale, NJ 07675  
Telephone: (201) 961-2142  
Attorneys for Plaintiffs

*Robert G. Ricco*

By: \_\_\_\_\_  
Robert G. Ricco, Esq. *Of Counsel*

**DEMAND FOR ANSWERS TO UNIFORM AND SUPPLEMENTAL INTERROGATORIES**

PLEASE TAKE NOTICE that pursuant to Rule 4:17-1(b)(ii)(2), Plaintiff hereby demands answers to Uniform Interrogatories Form C and Form C(1) within sixty (60) days of the filing of Defendant's Answer to this Complaint.

PLEASE TAKE FURTHER NOTICE that pursuant to Rule 4:17-1(b)(i)(1) and Rule 4:17-2, Plaintiff hereby demands answers to the attached **Supplemental Interrogatories** within sixty (60) days of the filing of Defendant's Answer to this Complaint.

**SUPPLEMENTAL INTERROGATORIES PERMITTED PURSUANT  
TO RULE 4:17-1(b)(i)**

S1. If you contend or will contend that the permanency of Plaintiff's injuries should not be evidential or be considered by the finder of fact, state with detail and with particularity and specificity each and every basis of fact or law upon which you will rely to support such contention.

S2. Pursuant to Rule 4:17-4, please designate any information set forth in your answers to these interrogatories which is not within the answerer's personal knowledge and as to that information please state the name and address of every person from whom it was received, or, if the source of the information is documentary, a full description of the document(s) including the location thereof.

S3. State the name and address of the location where the operator of Defendant's motor vehicle last entered Defendant's motor vehicle prior to the time of the alleged accident.

S4. Beginning from the location where the operator of Defendant's motor vehicle last entered said vehicle prior to the accident as set forth in the immediately preceding interrogatory, describe the course of travel taken by the operator of Defendant's vehicle up to the location of the accident setting forth street names and directions traveled.

S5. State whether an estimate of the damage to Defendant's vehicle was made subsequent to the subject accident, and if so, please state the name and address of the person, firm and/or corporation providing the estimate of damage, the date the estimate of damage was obtained and annex hereto a copy of any written estimate.



**CERTIFICATION**

Pursuant to the requirements of Rule 4:5-1 (NOTICE OF OTHER ACTIONS), I, the undersigned, do hereby certify to the best of my knowledge, information and belief, that except as hereinafter indicated, the subject matter of the controversy referred to in the within pleading is not the subject of any other Cause of Action, pending in any other Court, or of a pending Arbitration Proceeding, nor is any other Cause of Action or Arbitration Proceeding contemplated;

1. OTHER ACTIONS PENDING?.....YES \_\_\_ NO X

A. If YES - Parties to other Pending Actions.

B. In my opinion, the following parties should be joined in the within pending Cause of Action.

2. OTHER ACTIONS CONTEMPLATED?.....YES \_\_\_ NO X

A. If YES - Parties contemplated to be joined, in other Causes of Action.

3. ARBITRATION PROCEEDINGS PENDING?.....YES \_\_\_ NO X

A. If YES - Parties to Arbitration Proceedings.

B. In my opinion, the following parties should be joined in the pending Arbitration Proceedings.

4. OTHER ARBITRATION PROCEEDINGS CONTEMPLATED?.....YES \_\_\_ NO X

A. If YES - Parties contemplated to be joined to Arbitration Proceedings.

In the event that during the pendency of the within Cause of Action, I shall become aware of any change as to any facts stated herein, I shall file an amended certification and serve a copy thereof on all other parties (or their attorneys) who have appeared in said Cause of Action.

Attorneys for Plaintiff

*Robert G. Ricco*

by: \_\_\_\_\_  
Robert G. Ricco, Esq.

Dated: June 20, 2019

## Civil Case Information Statement

**Case Details: HUDSON | Civil Part Docket# L-002467-19**

**Case Caption:** RICCO ROBERT VS PEREZ VANESSA

**Case Initiation Date:** 06/21/2019

**Attorney Name:** ROBERT GEORGE RICCO

**Firm Name:** ROBERT G. RICCO

**Address:** 811 WESTWOOD AVE

RIVER VALE NJ 076756639

**Phone:**

**Name of Party:** PLAINTIFF : Ricco, Robert, G

**Name of Defendant's Primary Insurance Company**  
(if known): Unknown

**Case Type:** AUTO NEGLIGENCE-PERSONAL INJURY (VERBAL THRESHOLD)

**Document Type:** NJ eCourts Case Initiation Confirmation

**Jury Demand:** YES - 6 JURORS

**Hurricane Sandy related?** NO

**Is this a professional malpractice case?** NO

**Related cases pending:** NO

**If yes, list docket numbers:**

**Do you anticipate adding any parties (arising out of same transaction or occurrence)?** NO

**THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE**  
CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION

**Do parties have a current, past, or recurrent relationship?** NO

**If yes, is that relationship:**

**Does the statute governing this case provide for payment of fees by the losing party?** NO

**Use this space to alert the court to any special case characteristics that may warrant individual management or accelerated disposition:**

**Do you or your client need any disability accommodations?** NO

**If yes, please identify the requested accommodation:**

**Will an interpreter be needed?** NO

**If yes, for what language:**

**Please check off each applicable category:** Putative Class Action? NO Title 59? NO

I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with *Rule 1:38-7(b)*

06/21/2019  
Dated

/s/ ROBERT GEORGE RICCO  
Signed

ROBERT G. RICCO, ESQ.  
Admitted to Practice in  
New Jersey, New York and Florida  
[robertgricco@yahoo.com](mailto:robertgricco@yahoo.com)  
[robertgricco@gmail.com](mailto:robertgricco@gmail.com)

New York Offices  
79 Rennert Lane  
Bardonia, NY 10954  
99 Main Street  
Nyack, NY 10960

**The Law Offices of  
Robert G. Ricco, Esq.**  
811 Westwood Avenue\* 190 Main Street, 3<sup>rd</sup> c/o N, C & D LLC  
River Vale NJ 07675 Hackensack, NJ 07601

(201) 497-6524 - (201) 961-2142 fax (201) -992-3055

June 21, 2019

Re: Alex Popa v. Vanessa Perez and Mercedes Benz Corp  
Docket No. Hud – L-002467-19  
Correction of Deficiency as to CIS



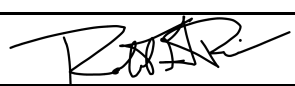
Dear Honorable Clerk:

Please accept this correction, and change the name of the plaintiff on the computer generated CIS form to Alexandru Popa, instead of the current attorney name of Robert G. Ricco. Mr. Ricco is the attorney for Plaintiff, not the Plaintiff himself. Mr. Popa's address is: 64 South Main Street, Apt. 1F, Spring Valley, NY 10977. Attached is an old fashioned CIS for additional help. We thank the Court Clerk for this correction.

Very truly yours,

Robert G. Ricco, Esq.

**Appendix XII-B1**

	<b>CIVIL CASE INFORMATION STATEMENT (CIS)</b>		<b>FOR USE BY CLERK'S OFFICE ONLY</b>	
	Use for initial Law Division Civil Part pleadings (not motions) under <i>Rule 4:5-1</i> <b>Pleading will be rejected for filing, under <i>Rule 1:5-6(c)</i>,                  if information above the black bar is not completed                  or attorney's signature is not affixed</b>		PAYMENT TYPE: <input type="checkbox"/> CK <input type="checkbox"/> CG <input type="checkbox"/> CA CHG/CK NO.: _____ AMOUNT: _____ OVERPAYMENT: _____ BATCH NUMBER: _____	
	ATTORNEY / PRO SE NAME ROBERT G. RICCO		TELEPHONE NUMBER (201) 961-2142	
	COUNTY OF VENUE Hudson		DOCKET NUMBER (when available)	
	FIRM NAME (if applicable) Law Office of Robert G. Ricco		DOCUMENT TYPE COMPLAINT	
OFFICE ADDRESS Robert G. Ricco 811 Westwood Avenue River Vale, NJ 0 7675		JURY DEMAND <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
NAME OF PARTY (e.g., John Doe, Plaintiff) ALEXANDRU POA  64 S Main St., Apt 1F, Spring Valley, NY 10977		CAPTION ALEXANDRU POPA v VANESSA PEREZ  and Mercedes-Benz, et al		
CASE TYPE NUMBER (See reverse side for listing)  603Y	HURRICANE SANDY RELATED? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	IS THIS A PROFESSIONAL MALPRACTICE CASE? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO IF YOU HAVE CHECKED "YES," SEE N.J.S.A. 2A:53 A -27 AND APPLICABLE CASE LAW REGARDING YOUR OBLIGATION TO FILE AN AFFIDAVIT OF MERIT.		
RELATED CASES PENDING? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		IF YES, LIST DOCKET NUMBERS		
DO YOU ANTICIPATE ADDING ANY PARTIES (arising out of same transaction or occurrence)? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		NAME OF DEFENDANT'S PRIMARY INSURANCE COMPANY (if known) unknown <input type="checkbox"/> NONE <input checked="" type="checkbox"/> UNKNOWN		
<b>THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE.</b>				
CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION				
DO PARTIES HAVE A CURRENT, PAST OR RECURRENT RELATIONSHIP? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		IF YES, IS THAT RELATIONSHIP: <input type="checkbox"/> EMPLOYER/EMPLOYEE <input type="checkbox"/> FRIEND/NEIGHBOR <input type="checkbox"/> OTHER (explain) <input type="checkbox"/> FAMILIAL <input type="checkbox"/> BUSINESS		
DOES THE STATUTE GOVERNING THIS CASE PROVIDE FOR PAYMENT OF FEES BY THE LOSING PARTY? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No				
USE THIS SPACE TO ALERT THE COURT TO ANY SPECIAL CASE CHARACTERISTICS THAT MAY WARRANT INDIVIDUAL MANAGEMENT OR ACCELERATED DISPOSITION				
 DO YOU OR YOUR CLIENT NEED ANY DISABILITY ACCOMMODATIONS? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		IF YES, PLEASE IDENTIFY THE REQUESTED ACCOMMODATION		
WILL AN INTERPRETER BE NEEDED? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		IF YES, FOR WHAT LANGUAGE?		
<b>I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be                  redacted from all documents submitted in the future in accordance with <i>Rule 1:38-7(b)</i>.</b>				
ATTORNEY SIGNATURE: 		June 20, 2019		

Side 2



# CIVIL CASE INFORMATION STATEMENT (CIS)

Use for initial pleadings (not motions) under *Rule* 4:5-1

**CASE TYPES** (Choose one and enter number of case type in appropriate space on the reverse side.)

**Track I - 150 days' discovery**

- 151 NAME CHANGE
- 175 FORFEITURE
- 302 TENANCY
- 399 REAL PROPERTY (other than Tenancy, Contract, Condemnation, Complex Commercial or Construction)
- 502 BOOK ACCOUNT (debt collection matters only)
- 505 OTHER INSURANCE CLAIM (including declaratory judgment actions)
- 506 PIP COVERAGE
- 510 UM or UIM CLAIM (coverage issues only)
- 511 ACTION ON NEGOTIABLE INSTRUMENT
- 512 LEMON LAW
- 801 SUMMARY ACTION
- 802 OPEN PUBLIC RECORDS ACT (summary action)
- 999 OTHER (briefly describe nature of action)

**Track II - 300 days' discovery**

- 305 CONSTRUCTION
- 509 EMPLOYMENT (other than CEPA or LAD)
- 599 CONTRACT/COMMERCIAL TRANSACTION
- 603N AUTO NEGLIGENCE – PERSONAL INJURY (non-verbal threshold)
- 603Y AUTO NEGLIGENCE – PERSONAL INJURY (verbal threshold)
- 605 PERSONAL INJURY
- 610 AUTO NEGLIGENCE – PROPERTY DAMAGE
- 621 UM or UIM CLAIM (includes bodily injury)
- 699 TORT – OTHER

**Track III - 450 days' discovery**

- 005 CIVIL RIGHTS
- 301 CONDEMNATION
- 602 ASSAULT AND BATTERY
- 604 MEDICAL MALPRACTICE
- 606 PRODUCT LIABILITY
- 607 PROFESSIONAL MALPRACTICE
- 608 TOXIC TORT
- 609 DEFAMATION
- 616 WHISTLEBLOWER / CONSCIENTIOUS EMPLOYEE PROTECTION ACT (CEPA) CASES
- 617 INVERSE CONDEMNATION
- 618 LAW AGAINST DISCRIMINATION (LAD) CASES

**Track IV - Active Case Management by Individual Judge / 450 days' discovery**

- 156 ENVIRONMENTAL/ENVIRONMENTAL COVERAGE LITIGATION
- 303 MT. LAUREL
- 508 COMPLEX COMMERCIAL
- 513 COMPLEX CONSTRUCTION
- 514 INSURANCE FRAUD
- 620 FALSE CLAIMS ACT
- 701 ACTIONS IN LIEU OF PREROGATIVE WRITS

**Multicounty Litigation (Track IV)**

- |   |   |
|---|---|
| 271 ACCUTANE/ISOTRETINOIN               | 296 STRYKER REJUVENATE/ABG II MODULAR HIP STEM COMPONENTS |
| 274 RISPERDAL/SEROQUEL/ZYPREXA          | 297 MIRENA CONTRACEPTIVE DEVICE                           |
| 281 BRISTOL-MYERS SQUIBB ENVIRONMENTAL  | 299 OLMESARTAN MEDOXOMIL MEDICATIONS/BENICAR              |
| 282 FOSAMAX                             | 300 TALC-BASED BODY POWDERS                               |
| 285 STRYKER TRIDENT HIP IMPLANTS        | 601 ASBESTOS  |
| 286 LEVAQUIN                            | 623 PROPECIA  |
| 289 REGLAN                              | 624 STRYKER LFIT CoCr V40 FEMORAL HEADS                   |
| 291 PELVIC MESH/GYNECARE                | 625 FIREFIGHTER HEARING LOSS LITIGATION                   |
| 292 PELVIC MESH/BARD                    | 626 ABILIFY   |
| 293 DEPUY ASR HIP IMPLANT LITIGATION    | 627 PHYSIOMESH FLEXIBLE COMPOSITE MESH                    |
| 295 ALLODERM REGENERATIVE TISSUE MATRIX | 628 TAXOTERE/DOCETAXEL                                    |
|   | 629 ZOSTAVAX  |
|   | 630 PROCEED MESH/PATCH                                    |

If you believe this case requires a track other than that provided above, please indicate the reason on Side 1, in the space under "Case Characteristics."

Please check off each applicable category ☐ Putative Class Action ☐ Title 59

HUDSON COUNTY SUPERIOR COURT  
HUDSON COUNTY  
583 NEWARK AVENUE  
JERSEY CITY NJ 07306

TRACK ASSIGNMENT NOTICE

COURT TELEPHONE NO. (201) 748-4400  
COURT HOURS 8:30 AM - 4:30 PM

DATE: JUNE 21, 2019  
RE: RICCO ROBERT VS PEREZ VANESSA  
DOCKET: HUD L -002467 19

THE ABOVE CASE HAS BEEN ASSIGNED TO: TRACK 2.

DISCOVERY IS 300 DAYS AND RUNS FROM THE FIRST ANSWER OR 90 DAYS  
FROM SERVICE ON THE FIRST DEFENDANT, WHICHEVER COMES FIRST.

THE PRETRIAL JUDGE ASSIGNED IS: HON KIMBERLY ESPINALES-MALONEY

IF YOU HAVE ANY QUESTIONS, CONTACT TEAM 002  
AT: (201) 795-6908.

IF YOU BELIEVE THAT THE TRACK IS INAPPROPRIATE YOU MUST FILE A  
CERTIFICATION OF GOOD CAUSE WITHIN 30 DAYS OF THE FILING OF YOUR PLEADING.  
PLAINTIFF MUST SERVE COPIES OF THIS FORM ON ALL OTHER PARTIES IN ACCORDANCE  
WITH R.4:5A-2.

ATTENTION:

ATT: ROBERT G. RICCO  
ROBERT G. RICCO

811 WESTWOOD AVE  
RIVER VALE NJ 07675-6639

ECOURTS